

DICKINSON WRIGHT PLLC
MICHAEL N. FEDER
Nevada Bar No. 7332
GABRIEL A. BLUMBERG
Nevada Bar No. 12332
3883 Howard Hughes Parkway, Suite 800
Las Vegas, Nevada 89169
Tel: (702) 550-4400
Fax: (844) 670-6009
Email: mfeder@dickinson-wright.com
Email: gblumberg@dickinson-wright.com

*Attorneys for Defendant
Cox Communications*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KARLA GORMAN,

Plaintiff,

vs.

EXPERIAN INFORMATION SOLUTIONS,
INC.; NATIONAL CONSUMER TELECOM
& UTILITIES EXCHANGE, INC., COX
COMMUNICATIONS; KOHL'S INC.

Defendants.

Case No. 2:22-CV-00369-JCM-BNW

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME FOR COX
COMMUNICATIONS TO RESPOND TO
PLAINTIFF'S COMPLAINT FOR
DAMAGES UNDER FCRA, 15 U.S.C. § 1681
[FIRST REQUEST]**

Defendant Cox Communications ("Cox"), by and through its attorneys, Dickinson Wright PLLC, and Plaintiff Karla Gorman ("Plaintiff"), by and through her attorneys, Freedom Law Firm and Kind Law, stipulate and agree as follows:

1. Plaintiff filed her Complaint for Damages under FCRA, 15 U.S.C. § 1681 on March February 28, 2022 (the "Complaint").
2. Plaintiff served Cox on March 2, 2022.
3. Cox's deadline to respond, move or otherwise pleads to the Complaint is March 23, 2022.

4. Plaintiff and Defendant have agreed that Cox shall have up to an including April 29, 2022, to respond, move or otherwise plead to the Complaint.

5. The request for an extension is so that Cox can review its records pertaining to the allegations in the Complaint.

6. This is the first stipulation between Plaintiff and Cox to extend the time for Cox to respond, move or otherwise plead to the Complaint and it is not being entered into for purposes of any delay.

Dated: March 21st, 2022.

Dated: March 21st, 2022.

DICKINSON WRIGHT PLLC

FREEDOM LAW FIRM

/s/: Michael N. Feder

MICHAEL N. FEDER

Nevada Bar No. 7332

GABRIEL A. BLUMBERG

Nevada Bar No. 12332

3883 Howard Hughes Parkway, Suite 800
Las Vegas, Nevada 89169

Tel: (702) 550-4400

Fax: (844) 670-6009

Email: mfeder@dickinson-wright.com

Email: gblumberg@dickinson-wright.com

Attorneys for Defendant

Cox Communications

/s/: Gerardo Avalos

GEORGE HAINES

Nevada Bar No. 9411

GERARDO AVALOS

Nevada Bar No. 15171

8985 S. Eastern Avenue, Suite 350
Las Vegas, NV 89123

Tel: (702) 880-5554

Fax: (702) 385-5518

Email: Chaines@freedomlegalteam.com

Email: Gavalos@freedomlegalteam.com

MICHAEL KIND

Nevada Bar No. 13903

KIND LAW

8860 South Maryland Parkway, Suite 106
Las Vegas, NV 89123

Tel: (702) 337-2322

Fax: (702) 329-5881

Email: mk@kindlaw.com

Attorneys for Plaintiff Karla Gorman

ORDER

IT IS SO ORDERED.

DATED: March 22, 2022


UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

The undersigned, an employee of Dickinson Wright PLLC, hereby certifies that on the 21st of March, 2022, she caused a copy of **STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR COX COMMUNICATIONS TO RESPOND TO PLAINTIFF'S COMPLAINT FOR DAMAGES UNDER FCRA, 15 U.S.C. § 1681[FIRST REQUEST]** to be served electronically to all parties of interest through the Court's *CM/ECF system* as follows:

Michael Kind
KIND LAW
8860 South Maryland Parkway, Suite 106
Las Vegas, NV 89123

George Haines
Gerard Avalos
FREEDOM LAW GROUP
8985 S. Eastern Avenue, Suite 350
Henderson, Nevada 89123
Tel: (702) 880-5554
Email: Ghaines@freedomlegalteam.com
Email: Gavalos@freedomlegalteam.com

Attorneys for Plaintiff Karla Gorman

/s/: Dianne Kelling
An Employee of Dickinson Wright PLLC